

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT MICHIGAN**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No. <u>2:15-cv-10285-LJM-DRG</u>
	)	Honorable Laurie J. Michelson
v.	)	Magistrate Judge David R. Grand
	)	
JOHN DOE subscriber assigned IP address	)	
69.136.133.109,	)	
	)	
Defendant.	)	
	)	

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**PLAINTIFF'S MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Plaintiff, Malibu Media, LLC, by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 26(c), hereby moves for entry of a Protective Order in the form attached hereto as Exhibit A and in support states:

1. For good cause shown, the district court may grant a protective order requiring that “a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way.” Fed. R. Civ. P. 26(c)(1)(G).

2. On May 15, 2015, Plaintiff served its First Set of Interrogatories and Requests for Production on Defendant. Within its discovery requests, Plaintiff seeks forensically sound copies of Defendant’s hard drives and examination of same. Defendant intends on producing his computer devices, but only after entry of a protective order.

3. The Parties have conferred and agreed on entry of a protective order. The parties stipulate and agree to the terms set forth in the Stipulate Protective Order For Production of Data on Defendant’s Computer Hard Drive in order to protect privileged and non-relevant information on the Defendant’s hard drives while allowing Plaintiff access to any relevant non-privileged

information. *See* Stipulate Protective Order For Production of Data on Defendant's Computer Hard Drive, attached hereto as Exhibit "A".

4. Accordingly, Plaintiff respectfully requests this Court enter a Protective Order in the form attached hereto as Exhibit A.

**WHEREFORE**, Plaintiff, Malibu Media, LLC, respectfully requests this Court enter a Protective Order in the form attached hereto as Exhibit A.

Dated: June 3, 2015

Respectfully submitted,

NICOLETTI LAW, PLC

By: /s/ Paul J. Nicoletti  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Paul J. Nicoletti